

**SUBMITTED ELECTRONICALLY**



**July 15, 2021**

EES Case Management Unit  
Environment and Natural Resources Division  
U.S. Department of Justice  
P.O. Box 7611  
Washington, D.C. 20044-7611  
Re: DJ # 90-5-2-1-09244/2

**Des Gillen**  
**President**  
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Attention: James Kavalec, Manager  
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City of Toledo  
Division of Environmental Services  
348 South Erie Street  
Toledo, Ohio 43604 Toledo, Ohio 43604  
Attention: Karen Granata, Administrator

**Re: United States of America and the State of Ohio, et.al. v. BP Products North America Inc. and BP-Husky Refining LLC**  
**Northern District of Ohio, Western Division**  
**Civil Action No. 3:20CV190**  
**CD LDAR Audit Corrective Action Plan**

**NO EPA ACTION REQUIRED: Information is being submitted for information purposes only.**

In accordance with Appendix A ¶ 31 of the referenced Consent Decree, attached is the Corrective Action Plan. This document also serves as the certification of the completion of corrective actions in the Corrective Action Plan.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Regards,

DocuSigned by:  
  
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Des Gillen  
President, BP-Husky Refining LLC  
VP Refining, Toledo, BP Products North America Inc.

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